

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION

UNITED STATES OF AMERICA)	DOCKET NO. 5:10 CR 54-V
)	
v.)	
)	
ANDREW GEIGER)	JOINT MOTION TO CONTINUE
)	
)	
)	
)	
)	

NOW COMES, Defendant Andrew Geiger, by and through counsel, John A. Garland, and the United States of America, by and through Anne M. Tompkins, United States Attorney for the Western District of North Carolina and respectfully submit the following:

1. This matter is currently on the Court's September 6, 2011 trial term. Defendant was indicted on November 17, 2010 for charges relating to wire fraud and money laundering.

2. Defense counsel represents Defendant Michael Rand in United States v. Michael Rand, 3:10CR182-RJC which has been set for trial as the first peremptory setting in the Court's October 3, 2011 calendar. That matter is a complex securities fraud case involving a publicly traded company which has and will require extensive trial preparation. The Government's case is anticipated to last approximately six weeks. There are approximately 100 witnesses who have been interviewed by the Government. The fraud was alleged to have occurred over the course of seven years. Millions of pages in discovery have been provided so far. Accordingly, defense counsel will be unavailable for the Court's September, 2011 trial calendar due to its final pre-trial preparation in that case.

3. The additional time would also permit the parties to further exercise due diligence in preparation for trial in this matter which involves a large volume of discovery. Defendant was charged in a multi-count Bill of Indictment with a series of wire fraud and money laundering charges relating to transactions taking place over a number of years.

WHEREFORE, the parties jointly request that the Court continue this matter from the September, 2011 trial calendar.

RESPECTFULLY SUBMITTED, this 19th day of August, 2011.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 19th day of August, 2011, the foregoing was duly served upon counsel for the United States of America in the following manner:

By electronic notification from the Court to:

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